

Exhibit 47

Redacted excerpts of deposition of Julia Duin
(November 16, 2023)

In the Matter Of:
THE SATANIC TEMPLE
VS
NEWSWEEK DIGITAL

JULIA DUIN
November 16, 2023



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November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----
4 THE SATANIC TEMPLE, INC.,)
5 Plaintiff,)
6 vs.) NO. 1:22-CV-01343-MKV
7 NEWSWEEK DIGITAL, LLC,)
8 Defendant.)
9 -----

COPY

10 Videotaped Deposition Upon Oral Examination

11 of

12 JULIA DUIN

13 -----

14 Thursday, November 16, 2023

15 9:37 a.m.

16 7900 Southeast 28th Street

17 Mercer Island, Washington

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24 Cheryl Macdonald, CRR, RMR

Court Reporter

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24

25

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1 interview process and your start date?

2 MS. TESORIERO: Objection to form.

3 A. Not really. I mean, we agreed on a start
4 date, I mean, as of September 1st.

5 Q. Was your role full-time or part-time?

6 A. I was full-time.

7 Q. Were you paid -- how were you paid? To
8 expand on the question, were you paid salary? Were
9 you paid piece rate?

10 A. Salary. I'm salary.

11 Q. What was the cadence with which you were
12 paid?

13 A. Cadence?

14 Q. Were you paid monthly?

15 A. Monthly, monthly.

16 Q. How much were you paid per month?

17 A. I don't have to say that.

18 Q. Yes, you do.

19 MS. TESORIERO: Actually, I'm going to
20 object.

21 A. No. I don't have to say that.

22 MS. TESORIERO: Hang on one second. That
23 is not relevant to the case.

24 MR. KEZHAYA: I disagree.

25 THE WITNESS: No.

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1 A. [As read] "A major rift in an organization
2 called The Satanic Temple: Defamation lawsuits,
3 anti-Semitic stuff, mismanagement of funds, NDAs being
4 used to hide wrongdoing, sexual harassment, shell
5 corporations, harassment of internal critics. Sounds
6 like quite a brew. Am diving into it to see if I can
7 glean anything new of how much of the story this is.
8 More to come."

9 Q. Was this the first pitch for the subject
10 article that you wrote?

11 A. I believe so.

12 Q. When did you begin working on this article?

13 A. Well, it would have been at the beginning
14 of October.

15 Q. I see that the date would be September
16 30th, so you clearly formulated the idea of the
17 article at some point before September 30th; correct?

18 A. Let's see. Well, remember, I have to pitch
19 it first to make sure they approve it before I start
20 major work on a piece.

21 Q. I understand that that might be before you
22 start major work. My question posed is when did you
23 start working on it, including minor work.

24 A. I don't remember.

25 Q. Was it before September 1st, 2020?

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1 A. Before September 1st?

2 Q. Correct.

3 A. No.

4 Q. Sorry. September 1st, 2021.

5 A. Before September 1st?

6 Q. Correct.

7 A. No.

8 Q. So during the month of September 2021, you
9 began work on this article; correct?

10 A. No. I wasn't working during the month of
11 September. I was overseas most of that month, or part
12 of that month. So, no.

13 Q. Your earlier testimony is that you began
14 working full-time at Newsweek in September of 2021; is
15 that correct?

16 A. Yeah. And I was also -- well, never mind.

17 Q. You were overseas, correct?

18 A. Doing articles for Newsweek, yes.

19 Q. And this pitch is part of your work on this
20 article; correct?

21 MS. TESORIERO: Objection to form.

22 A. Not sure where you're going.

23 Q. You don't have to know where I'm going. My
24 question posed is whether this pitch was part of your
25 work for Newsweek creating the subject article.

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1 **Correct or incorrect?**

2 MS. TESORIERO: Objection to form.

3 A. This pitch was the -- this would have been,
4 really, the beginning of my work on this article.

5 **Q. This pitch was the very beginning of your**
6 **work on this article; correct?**

7 MS. TESORIERO: Objection.

8 A. I would say yes.

9 **Q. That's your testimony?**

10 MS. TESORIERO: Objection.

11 A. Just a moment. It depends on what you call
12 "work."

13 **Q. What was entailed in drafting this pitch?**

14 A. I had gotten -- I had gotten an idea for
15 this article and I drafted the pitch.

16 **Q. Where did the idea come from?**

17 A. I had -- someone suggested it to me.

18 **Q. Who suggested it to you?**

19 A. I had a -- another journalist.

20 **Q. Another journalist suggested it to you?**

21 A. Mm-hmm.

22 **Q. Who was this journalist?**

23 A. His name is Kevin.

24 **Q. What is Kevin's last name?**

25 A. Trying to remember. My mind is blank right

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1 now. I can't remember.

2 Q. How did you know Kevin?

3 A. Actually, I really didn't know him.

4 Somehow he had heard of me. I really didn't -- I

5 really hardly knew the man. I mean, I really didn't

6 know him, actually.

7 Q. How did Kevin convey this idea for this
8 article?

9 A. E-mail.

10 Q. Did he write this pitch for you?

11 A. Did he write the pitch?

12 Q. Correct.

13 A. I wrote the pitch. He had some -- some of

14 this is -- some of this is pitch is taken from what he

15 wrote me.

16 Q. When did he write you that? Before or
17 after September 1st, 2021?

18 A. When did he send me that e-mail? Let's

19 see. I'm trying to remember. I know I had gotten an

20 e-mail, and I'm just trying to remember when. Trying

21 to remember when he sent it to me. And I -- I don't

22 remember. I don't remember. I really don't remember

23 when he sent it to me.

24 Q. Did you provide your counsel approximately

25 26 pages of e-mails in the course of preparing for

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1 Q. Did you negotiate an annual salary?

2 A. Yes.

3 Q. Okay. And was that annual salary divided
4 by 12 to constitute a monthly payment?

5 MS. TESORIERO: Objection. The judge just
6 said you can ask her what she was paid in October of
7 2021. She has answered that question.

8 MR. KEZHAYA: She has not. She has said
9 it's something more than [REDACTED] and her preference
10 would be to round it at [REDACTED]. However, we don't
11 really know if that's the answer. So I'm trying to
12 get to the answer with specificity.

13 A. You lost me.

14 MS. TESORIERO: Would you repeat the
15 question?

16 Q. That was a colloquy between counsel. Did
17 you negotiate an annual salary?

18 A. Yes. I negotiated an annual salary.

19 Q. Was that annual salary to be paid monthly?

20 A. Yes.

21 Q. What was the annual salary?

22 THE WITNESS: Do I have to answer that
23 question?

24 MS. TESORIERO: She's given you an estimate
25 for the month. That was the judge's order. If you

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1 wanted the annual salary, why didn't you bring it up
2 when we just had the judge on the phone?

3 MR. KEZHAYA: Because I expected she would
4 give me a specific answer, not a rounded answer. I
5 want to know the specific answer.

6 A. I mean, what is it? \$[REDACTED]. I mean, you
7 know, multiply by 12.

8 MR. KEZHAYA: Hold on. There is a lawyer
9 colloquy going on here. The question posed is, "How
10 much were you paid per month?" That was authorized.
11 She could not give me a specific answer. I want a
12 specific answer. I don't want an estimated answer. I
13 want the answer. Hold on. And since Newsweek has not
14 provided the document that could have answered this
15 question, I have to get it from her.

16 MS. TESORIERO: Well, you brought it up
17 again in a deposition. We had an ongoing dispute
18 about this that we could've brought up without the
19 judge for documents. Now that the judge has ruled
20 this way, we will provide you the document with the
21 exact number.

22 MR. KEZHAYA: That will do.

23 Q. Was this monthly payment the same every
24 month?

25 A. I'm trying to remember. There might have

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1 been a penny or two difference.

2 Q. Okay. But --

3 A. Yeah, pretty much.

4 Q. In terms of whether it was front loaded or
5 back loaded or anything, October 2021 would have been
6 the same as September of 2021?

7 A. Yeah.

8 Q. What about bonuses? Were you paid a bonus
9 for this article?

10 A. No, no.

11 Q. Did Newsweek have a bonus structure at the
12 time that you wrote this article?

13 MS. TESORIERO: Objection to form.
14 Objection to form.

15 A. I mean, I don't -- I don't know what they
16 did with other reporters.

17 Q. So in the course of your negotiations with
18 Newsweek, was bonuses a contemplated aspect of payment
19 that you might receive?

20 A. There was no discussion of bonuses.

21 MR. KEZHAYA: Okay. And as addressed while
22 the video was off, we're going to find out the timing
23 that Kevin sent you the article idea at our next
24 break.

25 MS. TESORIERO: Yes. And we'll revisit

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1 Q. And you said that they laid you off because
2 of finances?

3 A. Yes.

4 Q. Could you please expand?

5 A. That's all I was told.

6 Q. Who told you that?

7 A. It was Dayan.

8 Q. And when did that conversation take place?

9 A. November of 2022.

10 Q. Was it effective immediately or effective
11 at some future date?

12 A. Future date.

13 Q. What was the future date?

14 A. February 2023.

15 Q. So you were paid through February of 2023?

16 A. Trying to remember. Yes.

17 Q. Your last article is dated January 1, 2023.

18 A. Mm-hmm.

19 Q. So you were paid for both January and
20 February of 2023 even though you didn't write any more
21 articles for Newsweek?

22 MS. TESORIERO: Objection to form.

23 A. Yes, sir.

24 Q. Did you perform any services for Newsweek
25 in January or February of 2023?

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1 **photos.**

2 A. All right. No. That was -- no, I did not.

3 **Q. Did Jinx Strange ever give you any names of**
4 **individuals who have allegedly been sexually abused by**
5 **anyone in the course of TST services and then covered**
6 **up?**

7 MS. TESORIERO: Objection to form.

8 A. He said he was willing to, but I didn't ask
9 him.

10 **Q. You did not ask him. Why didn't you ask**
11 **him?**

12 A. Because the article was mainly on the
13 lawsuit, and it was not on the -- it was not an
14 investigation into the sexual abuse or the finances or
15 the alt-right figures. It wasn't on these various
16 permutations. The article was on the QueerSatanic
17 people.

18 **Q. Well, I mean, the article was about the**
19 **sexual abuse and cover-up plan, was it not?**

20 MS. TESORIERO: Objection to form.

21 A. No. The article was on the lawsuit.

22 **Q. Then why did you include the statement?**

23 A. I included a lot of statements.

24 **Q. Why didn't you include the subject**
25 **statement for which we are here today?**

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1 In terms of there were -- I knew there were
2 complaints about finances. Even Doug Laycock -- we're
3 talking about the sentence afterwards. Doug Laycock
4 went into that for his book. So, you know, Jinx had
5 given kind of a general -- it was a general read of
6 The Satanic Temple. And it was his -- it was how he
7 saw the state of the religion. And from my other
8 interviews with people, I found it plausible he was
9 correct.

10 Q. Did you ask Lucien Greaves about coerced
11 sexual activity and cover-up within The Satanic
12 Temple?

13 A. I asked him -- I certainly asked him in
14 connection with the orgies, yes.

15 Q. Not in connection with the orgies. Did you
16 ask him specifically about Jinx Strange's comment?

17 A. No. I did not ask him about Jinx Strange's
18 comment.

19 Q. Why not?

20 A. Why not? I didn't -- I felt I had asked
21 Lucien plenty of questions. And right below that, I
22 had a quote from Lucien that basically denied all
23 these accusations.

24 Q. Did you confront Lucien Greaves with the
25 allegation that there are accounts of sexual abuse and

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1 cover-up within The Satanic Temple?

2 MS. TESORIERO: Objection. Asked and
3 answered.

4 A. Did I confront him? Did I confront him?
5 Trying to remember. I don't believe I did.

6 Q. So Lucien Greaves's comment in his e-mails
7 could not possibly have related to something that you
8 did not confront him with. You would agree with me
9 there; correct?

10 MS. TESORIERO: Objection to form.

11 A. I disagree.

12 Q. You disagree?

13 A. I disagree.

14 Q. Please explain your basis for disagreeing.

15 A. His quote here -- his quote underneath, it
16 covered the -- all of Jinx's accusations. He says,
17 "We are accused of all sorts of nefarious things." I
18 covered it. I covered what Jinx was saying.

19 Q. Did you ever even mention the word Jinx
20 Strange -- the name "Jinx Strange" to Lucien Greaves?

21 A. I believe I talked to -- I may have talked
22 to Jinx maybe after I talked to Lucien.

23 Q. So you didn't even talk to Jinx Strange and
24 then talk to Lucien, and yet you're telling me that
25 Lucien's comment pertains to Jinx Strange's

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1 Strange or the allegations to Lucien Greaves, I find
2 it very difficult to understand how Lucien Greaves's
3 comment could have any pertinence to Jinx Strange's
4 allegations.

5 A. I don't see how --

6 THE REPORTER: Please. I need to hear the
7 end of the question.

8 MR. KEZHAYA: Jinx Strange or Jinx
9 Strange's allegation.

10 MS. TESORIERO: Are you asking her a
11 question?

12 MR. KEZHAYA: I'm asking her to explain
13 what she's -- where she's coming from with her
14 testimony.

15 MS. TESORIERO: Objection. Asked and
16 answered.

17 A. The way -- the way I constructed the
18 article is that the -- okay. Jinx gave -- Jinx had
19 several things to say about the organization, the
20 alt-right, the sexual abuse, the finances. And I had
21 Lucien giving a general denial about -- a general
22 denial. I did not feel he -- Lucien's general
23 statement had to address every single thing
24 specifically.

25 Q. Why did you have him address anything in

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1 talked to person B right afterwards. You can have --
2 you know, you can have them from separate
3 conversations at different times. So if I have a
4 quote from Lucien that applies to various accusations
5 that people make to The Satanic Temple, I have the
6 right to put that in under a Jinx quote no matter when
7 Lucien said it.

8 Q. Would you agree with me that the accusation
9 that TST engages in sexual abuse and cover-up is
10 serious?

11 MS. TESORIERO: Objection to form.

12 A. Well, sure. That's what kind of got the
13 Seattle people in trouble; right?

14 Q. Would you agree with me that writing an
15 article that states TST engages in sexual abuse and
16 cover-up is a criminal allegation?

17 MS. TESORIERO: Objection to form. That
18 misrepresents the article and calls for a legal
19 conclusion.

20 A. Okay. Can you please restate that.

21 Q. Is sex abuse a crime?

22 A. I believe so.

23 Q. Is covering up sex abuse also a crime?

24 MS. TESORIERO: Objection. Form. She's
25 not a lawyer.

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1 A. So what question do I have to answer?

2 Q. All of them, until you are instructed not
3 to.

4 MS. TESORIERO: Repeat the question.

5 A. Yeah. One second.

6 MS. TESORIERO: Let's get the pending
7 question on the record. Would you please repeat the
8 question.

9 Q. Is covering up sexual abuse a crime?

10 MS. TESORIERO: Objection. Calls for a
11 legal conclusion.

12 You can answer.

13 A. Is it a crime? Is covering up sexual abuse
14 a crime?

15 Q. Correct.

16 A. I don't know.

17 Q. But sex abuse is definitely a crime?

18 A. Sex abuse is a crime. Covering up, I don't
19 know.

20 Q. So making the allegation that TST engages
21 in criminal activity is serious. You agree with that;
22 correct?

23 MS. TESORIERO: Objection to form.
24 Mischaracterizes prior testimony.

25 A. Okay. I do not -- where do I -- did I say

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1 question.

2 Q. Julia, I know things are getting heated,
3 but you need to let me finish the question.

4 MS. TESORIERO: You need to let her finish
5 her answers, too.

6 MR. KEZHAYA: Fair.

7 A. Did I ask anyone? Anyone to be 7 billion
8 people? I mean --

9 Q. Well, did you ask anyone on the face of the
10 planet what sexual abuse and cover-up means in the
11 context of this here quote?

12 MS. TESORIERO: Objection to form.

13 A. Okay. I'll say no to that one. All right?

14 Q. Thank you.

15 (Exhibit Nos. 11 and 12 were marked for
16 identification.)

17 A. There's two here.

18 Q. There's two, Exhibit 11 and Exhibit 12.

19 A. Is one of them 10?

20 Q. I believe 10 was previously introduced.

21 MS. TESORIERO: I think 10 might have been
22 just sitting in front of you.

23 THE WITNESS: All right.

24 Q. Do you have Exhibit 11 in front of you?

25 A. Yes, I do.

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1 Q. But you don't recall when you used it
2 otherwise. That's your testimony; right?

3 MS. TESORIERO: Objection to form.

4 A. God in heaven. No. I don't recall. I
5 mean, I rarely used it. And I told you, it was like
6 -- I mean, no. I'm just going to say I don't recall.
7 I'm sick and tired of this. I mean, it is harassing
8 me.

9 Q. This is not harassment.

10 A. Yes, it is.

11 Q. You-all can take it to the judge if you
12 think this is harassment, but when you I definitely
13 did not and also "I don't recall," I'm just telling
14 you right now this is (inaudible) --

15 MS. TESORIERO: Please don't talk to my
16 witness. Ask her a question and let's move on.

17 MR. KEZHAYA: Fair.

18 Q. Earlier you testified that you had how many
19 supervisors?

20 A. Juliana was my direct supervisor at the
21 time.

22 Q. How many supervisors did you testify you
23 had before?

24 A. Well, there was a direct one, and then
25 there was one over her and then one over him. So

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1 there was a direct one. Add them all up, I guess.

2 You could call -- you know, there was one direct one.

3 There were three -- I guess you could say three were

4 involved with me.

5 Q. And those three were Nancy Cooper, Dayan,
6 and Juliana; correct?

7 A. Nancy, Dayan, and Juliana, right.

8 Q. Juliana was your direct supervisor;
9 correct?

10 A. Yes.

11 Q. Did she have any involvement in the writing
12 of this article?

13 A. She was listening -- no, not really. No.
14 She was involved in the e-mails in the first week or
15 two, but then she did not do any of the editing.

16 Q. Was she involved in the pitching of this
17 article?

18 A. Well, yeah. I mean, she received my pitch.

19 Q. Did she green light this article?

20 A. Let's see. The article was discussed in a
21 meeting, and she would have been one of three people.
22 All three people would have green lighted it. I'm
23 trying to remember. I mean, it was a four-way
24 discussion. I cannot remember what Juliana personally
25 said during those discussions. She did not really say

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1 asking me if I circled back after this hour-long --
2 hour-and-a-half-long interview and asked them about
3 something, this particular statement, who the "they"
4 was?

5 Q. I'm trying to ascertain if you performed
6 any form of fact investigation on anything that these
7 people had to say.

8 MS. TESORIERO: Objection to form.

9 A. I performed -- look, yes, I did check out
10 stuff, but you're asking about one sentence.

11 Q. When you say you checked out stuff, did you
12 find any individuals who was actually sexually
13 harassed in TST?

14 MS. TESORIERO: Objection to form.

15 A. Shall we say -- okay. I found people who
16 said they knew people who were sexually harassed. How
17 about that?

18 Q. No, not how about that. Did you actually
19 talk to any individuals who were actually sexually
20 harassed by TST?

21 MS. TESORIERO: Objection to form.

22 Q. Yes or no.

23 A. Did I talk to -- no, I did not.

24 Q. Of the people who claim that they know
25 people who were sexually harassed by TST, did you ask

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1 even names or contact information who theoretically
2 could be followed up with?

3 A. No.

4 Q. You have been a journalist for 45 years;
5 correct?

6 A. Yes.

7 Q. You have been a professor of journalism for
8 approximately two and a half years; correct?

9 A. Mm-hmm.

10 Q. Do you consider yourself a serious
11 journalist?

12 MS. TESORIERO: Objection to form.

13 A. Yes, I do.

14 Q. Did you consider this piece of work to be a
15 credible, serious, and fair statement about sexual
16 abuse and cover-up?

17 A. My article was fair, yes.

18 Q. I'm asking you about the statement.

19 A. About your statement?

20 Q. Your statement. The one that you put in
21 the article.

22 A. Yes, I did. It was fair. And, yes, if I
23 hadn't believed that there wasn't sexual abuse going
24 on, I would not have put that into the article.

25 Q. And what was your basis to believe there

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1 the future article ideas we discussed. And there's
2 one story I am working on re The Satanic Temple that
3 is really taking off. I am having a ton of
4 disgruntled members contact me, and what started out
5 as a TST lawsuit against four former Seattle-based
6 members has turned into a much bigger story. More
7 below."

8 Q. These are disgruntled former members who
9 were your sole sources for the claim that there was
10 actually sexual abuse and cover-up. Correct?

11 MS. TESORIERO: Objection to form.

12 A. That's what I call them here.

13 Q. That's what you called them; correct?

14 A. There.

15 Q. And they are, in fact, disgruntled former
16 members; correct?

17 MS. TESORIERO: Objection to form.

18 A. Yes.

19 Q. Do you feel you have an ethical obligation
20 to convey both sides of a serious allegation?

21 A. I did.

22 Q. Did you?

23 A. Yes.

24 Q. Where did you ask Lucien Greaves about
25 sexual abuse and cover-up?

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1 C E R T I F I C A T E

2

3 STATE OF WASHINGTON)

4) ss.

5 COUNTY OF KING)

6

7 I, the undersigned Washington Certified Court
8 Reporter, pursuant to RCW 5.28.010, authorized to
9 administer oaths and affirmations in and for the State
10 of Washington, do hereby certify:

11 That the annexed and foregoing deposition
12 consisting of Page 1 through 199 was taken
13 stenographically before me and reduced to a typed
14 format under my direction;

15 I further certify that according to CR 30(e) the
16 witness was given the opportunity to examine, read and
17 sign after the same was transcribed, unless indicated
18 in the record that the review was waived;

19 I further certify that all objections made at the
20 time of said examination to my qualifications or the
21 manner of taking the deposition, or to the conduct of
22 any party, have been noted by me upon said deposition;

23 I further certify that I am not a relative or
24 employee of any such attorney or counsel, and that I
25 am not financially interested in said action or the

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1 outcome thereof;

2 I further certify that the witness before
3 examination was by me duly sworn to testify to the
4 truth, the whole truth, and nothing but the truth;

5 I further certify that the deposition, as
6 transcribed, is a full, true and correct transcript of
7 the testimony, including questions and answers, and
8 all objections, motions, and exceptions of counsel
9 made and taken at the time of foregoing examination
10 and was prepared pursuant to Washington Administrative
11 Code 308-14-135, the transcript preparation format
12 guideline;

13 I further certify that I am sealing the
14 deposition in an envelope with the title of the above
15 cause and the name of the witness visible, and I am
16 delivering the same to the appropriate authority;

17

18 IN WITNESS WHEREOF, I have hereunto set my hand,
19 and affixed my official seal this 22nd day of
20 November 2023.

21

22

Cheryl Macdonald, CCR

23

Washington State Certified

24

Court Reporter

25

License No. 2498

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1 D E C L A R A T I O N

2

3

4

5 I declare under penalty of perjury that I
6 have read my within deposition, and the same is true
7 and accurate, save and except for changes and/or
8 corrections, if any, as indicated by me on the
9 correction sheet hereof.

10

11

12

13

JULIA DUIN

14

15

16

17

18

19 Dated this _____ day of _____,
20 2023.

21

22

23

24

25 CHERYL MACDONALD, Court Reporter

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1 MOBURG REPORTING
 2 COURT REPORTERS & LEGAL VIDEO
 3 33400 9th Avenue South
 4 Suite 207
 Federal Way, WA 98003
 206-622-3110

5
 6 PLEASE MAKE ALL CHANGES OR CORRECTIONS ON THIS SHEET,
 7 SHOWING PAGE, LINE, AND REASON, IF ANY. SIGN THIS
 SHEET, SIGN THE ACCOMPANYING SIGNATURE SHEET AND
 RETURN AS PER INSTRUCTIONS IN COVER LETTER.

8	PAGE	LINE	CORRECTION AND REASON
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(SIGNATURE)

REPORTER: CHERYL MACDONALD

November 16, 2023

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1

MOBURG REPORTING

2

Court Reporters & Legal Video
33400 9th Avenue South, Suite 207

3

Federal Way, WA 98003
(206) 622-3110 FAX (206) 343-2272

4

E-mail: info@moburgreporting.com

5

6

TO: Sara Tesoriero
51 Astor Place

November 22, 2023

7

New York, New York 10003

8

IN RE: The Satanic Temple v. Newsweek

9

DEPOSITION(S) OF: Julia Duin

10

DATE OF DEPOSITION: November 16, 2023

11

12

A copy of the deposition transcript of the above-named
is provided via E-transcript. Please have the
13 deponent read the deposition, sign the correction
sheet and declaration. The signed correction sheet
14 and declaration should then, within 30 (thirty) days,
be forwarded to:

15

CHERYL MACDONALD

16

33400 9th Ave. So. #207

17

Federal Way, Washington 98003

18

who will then enclose them in the original transcript,
19 seal it, and forward it to Mr. Kezhaya for retention
until the time of trial.

20

If you have any questions, feel free to contact
21 me at the number listed above.

22

Sincerely,

23

24

CHERYL MACDONALD, CCR

25

CC: M. Kezhaya

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1

Certification of Court Rule and WAC Compliance

2

The Satanic Temple v. Newsweek

3

4 I, VALERIE SEATON, am an authorized representative of
5 MOBURG REPORTING and do hereby, under penalty of perjury,
6 certify that Moburg Reporting and all court reporters
7 providing services in the above-captioned case on MOBURG
8 REPORTING'S behalf will fully comply with all applicable
9 rules and regulations governing the provision of court
10 reporting services, including, where applicable,
11 Washington Superior Court Rule 28(c)-(e) and WAC
12 308-14-130(1).*

8

11/22/23

9

10 Valerie L. Seaton
11 President
12 Moburg Reporting

Date

11

12 *28(c) Disqualification for Interest. No deposition
13 shall be taken before a person who is a relative or
14 employee or attorney or counsel of any of the parties, or
15 is a relative or employee of such attorney or counsel, or
16 is financially interested in the action.

17 28(d) Equal Terms Required. Any arrangement concerning
18 court reporting services or fees in a case shall be
19 offered to all parties on equal terms. This rule applies
20 to any arrangement or agreement between the person before
21 whom a deposition is taken or a court reporting firm,
22 consortium, or other organization providing a court
23 reporter, and any party or any person arranging or paying
24 for court reporting services in the case, including any
25 attorney, law firm, person or entity with a financial
26 interest in the outcome of the litigation, or person or
27 entity paying for court reporting services in the case.

28 28(e) Final Certification of the Transcript. The court
29 reporter reporting a deposition shall not certify the
30 deposition transcript until after he or she has reviewed
31 the final version of the formatted transcript. A court
32 reporting firm, consortium, or other organization
33 transmitting a court reporter's certified transcript
34 shall not alter the format, layout, or content of the
35 transcript after it has been certified.

36 *308-14-130(1) Offer arrangements on a case
37 concerning court reporting services or fees to all parties
38 on equal terms.